



State of Rhode Island and Providence Plantations
Department of Environmental Management
Office of Waste Management
235 Promenade Street
Providence, RI 02908

21 May 1997

Mr. Philip Otis, P.E., Remedial Project Manager
US Department of the Navy, Northern Division
Code 18, Mail Stop #82
10 Industrial Highway
Lester, PA 19113-2090

RE: Draft Final Feasibility Study
Site 07, Calf Pasture Point
NCBC Davisville, Rhode Island
Submitted 7 April 1997, Dated April 1997

Dear Mr. Otis;

The Rhode Island Department of Environmental Management (RIDEM) Office of Waste Management has reviewed the above referenced document which also responded to our 5 February 1997 comments on the draft document. Based on previous conversations the Navy has indicated a preference for Alternative 2 (Institutional Controls). In principle, RIDEM finds this alternative to be acceptable with some modifications:

1. The RIDEM Water Quality Regulations for Water Pollution Control are an ARAR for this site. Specifically, Sections 7.2 (Discharges Shall Not Further Degrade Low Quality Waters) and 7.4 (Class A and SA Waters) apply. Section 7.2 states that no discharge of pollutants shall be allowed which would cause or result in additional degradation of State waters even if they currently do not meet their designated classification. Section 7.4 states that no new discharges will be permitted in to class A or SA waters or lesser class waters which have attained class A or SA quality.

The waters under Calf Pasture Point are classified as GB, however, surface waters which have not been specifically classified are considered Class A (Section 6.4). This would include wetlands on Calf Pasture Point (Section 5, Waters of the State). In addition, both Allen Harbor and Narragansett Bay are currently classified as SA.

Therefore, based on the above, the Water Quality Regulations are an ARAR and should be considered as part of the final selection of an alternative since contamination has the potential to migrate from the site.

2. The monitoring plans proposed with the action alternatives (2 thru 6) include only

groundwater testing. To insure that the identified plumes detected at Calf Pasture Point are not impacting class A and SA waters RIDEM will additionally require that sediments and surface waters also be sampled as part of the monitoring plan. This would include sediments adjacent to Calf Pasture Point as well as surface water bodies and sediments within Calf Pasture Point. The specific details of the monitoring plan can be worked out during the design phase, however, the Feasibility Study should be modified to include sediment and surface water monitoring as part of the description of the monitoring plan for the alternatives.

3. The monitoring plans within the Feasibility Study state that groundwater would be tested once every six months. Typically, when RIDEM initiates a monitoring plan, groundwater is monitored on a quarterly basis in the beginning. After sufficient data has been obtained that would show a decreasing trend in the data, the frequency of sampling could be reduced. Similarly, the same criteria would apply to surface waters. Sediments could be initially sampled on a twice yearly basis (preferably during high and low water tables).
4. RIDEM reiterates its concern that geologic information about Allen Harbor is necessary in this case to locate possible discharge points for the contaminated plume under Calf Pasture Point.

RIDEM looks forward to working with the Navy and EPA to finalizing this Feasibility Study. If you have any questions or require additional information please call me at (401) 277-3872 ext. 7138.

Sincerely,



Richard Gottlieb, P.E.
Principal Sanitary Engineer

Attachment:

cc: W. Angell, DEM OWM
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